

EXHIBIT B

no "suggested" or "standard" royalties set forth in these documents. The place for the financial numbers in the templates is left blank.

4. These documents are kept on a legal-department-only intranet at Intel, and are treated as attorney-client privileged documents within Intel.

5. Three of the "template" documents contain alternate options and instructions written by attorneys, embedded throughout, with legal advice concerning those alternate options. The other three use blanks instead of the information that would be specific to a particular deal (e.g., names of parties, payment terms).

INTEL LEGAL TEAM DOCUMENTS

6. Twelve documents on Intel's log are from the Intel Legal Team website.

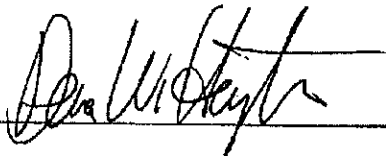
7. Offensive patent analysis. To the best of my knowledge, five of these documents are documents written by Brad Greenwald (an Intel in-house lawyer) or someone working under his direction. These documents are directed to lawyers performing or overseeing patent analysis and describe various approaches to analyzing how a particular Intel patent relates to a product.

8. Consultant Engagement And Management. One document addresses the procedural aspects of managing the legal relationship with a consultant. The purpose of this document is to guide lawyers from Intel's Patents and Licensing Group in their retention of consultants. This document does bear in any way on the financial terms for a given deal.

9. Corporate Licensing Group. The remaining documents are pages from the intranet of the Corporate Licensing Group. These reflect lawyers' judgment as to the appropriate level of patent analysis at each phase of a licensing project. These also reflect lawyers' judgment about the appropriate level of information required to advise Intel management about a particular licensing transaction at any given stage of the transaction. These guidelines do not even mention "royalties" and do not lay out the what any given patent would be worth to Intel or what any given royalty "should" be.

I declare under penalty of perjury that this Declaration is true and correct.

Dated: February 5, 2007



A handwritten signature, appearing to read "Don W. Steyer", is written over a horizontal line.